



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*United States District Courthouse  
300 Quarropas Street  
White Plains, New York 10601*

March 23, 2021

The Honorable Judith C. McCarthy  
United States Magistrate Judge  
Southern District of New York  
300 Quarropas Street  
White Plains, NY 10601-4150

Re: United States v. Alicia Ayers, et al., 21-MJ-3110

Dear Judge McCarthy:

Defendants Alicia Ayers, Andrea Ayers, and Traci Proctor have been arrested and will be brought before this Court or the U.S. District Court for the Northern District of Georgia today for their initial appearances on the above-referenced complaint, which charges them with conspiracy to commit wire fraud, wire fraud, false statements, and aggravated identity theft, in violation of Title 18, United States Code, Sections 1349, 1343, 1001, and 1028A, respectively. Accordingly, the Government respectfully requests that Your Honor sign an order unsealing the Complaint and arrest warrants.

Thank you for your consideration.

Respectfully submitted,

AUDREY STRAUSS  
United States Attorney

By:

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Jeffrey C. Coffman  
Assistant United States Attorney  
(914) 993-1940

SO ORDERED:

3/23/2021  
HON. JUDITH C. McCARTHY  
United States Magistrate Judge  
Southern District of New York